



Lahontan Regional Water Quality Control Board

May 24, 2016

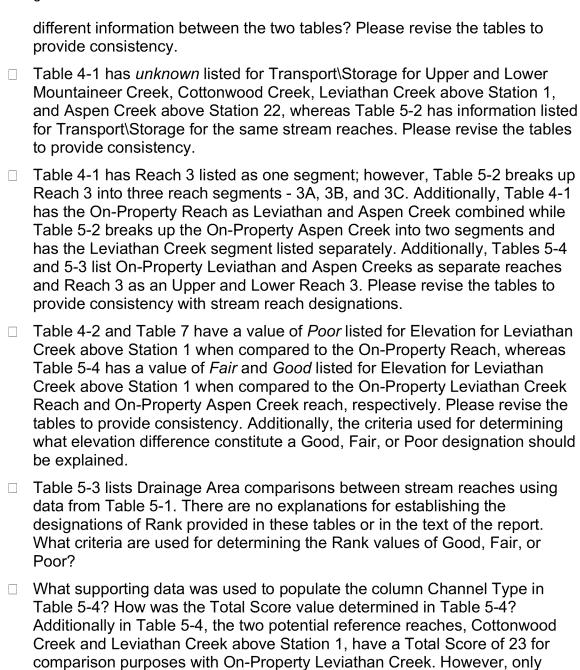
Lynda Deschambault United States Environmental Protection Agency, Region 9 75 Hawthorne Street San Francisco, CA 94105

COMMENTS ON ATLANTIC RICHFIELD COMPANY'S FINAL REFERENCE AREA FOCUSED REMEDIAL INVESTIGATION (FRI) WORK PLAN AND TABLE 2 - RESPONSE TO LRWQCB COMMENTS ON ATLANTIC RICHFIELD RESPONSE TO LRWQCB COMMENTS ON DRAFT FINAL REFERENCE AREA FOCUSED REMEDIAL INVESTIGATION WORK PLAN (WORK PLAN DATED FEBRUARY 28, 2015, ATLANTIC RICHFIELD RESPONSES DATED AUGUST 14, 2015, LRWQCB COMMENTS DATED AUGUST 31, 2015), LEVIATHAN MINE SITE, ALPINE COUNTY, CALIFORNIA

Thank you for the opportunity to comment on Atlantic Richfield Company's March 3, 2016, Final Reference Area FRI Work Plan and Table 2 - Response to LRWQCB Comments on Atlantic Richfield Response to LRWQCB Comments on Draft Final Reference Area Focused Remedial Investigation Work Plan (Work Plan Dated February 28, 2015, Atlantic Richfield Responses Dated August 14, 2015, LRWQCB Comments Dated August 31, 2015) [referred to as Table 2 RTC] for the Leviathan Mine Site. The California Regional Water Quality Control Board, Lahontan Region (Water Board) staff has the following comments:

- 1. Table 2 RTC, Page 1 of 4, Comment # 1 It is not clear based on Figures 1-3 how ecology is not significantly different between Cottonwood Creek and On-property reaches based on Rapid Bioassessment Protocol (RBP) scoring. The figures showing RBP scores include colored bars representing various types of measurements which are not all necessarily related to ecology and no units are included. How do these figures display the similarities in ecology between stream reaches? If these figures were used in the decision criteria for reference stream selection, they should be included in the report with associated data values for specific measurements taken.
- 2. There are inconsistencies with information provided in the tables. For example:
 - □ Table 4-1 has an *unknown width* for Upper and Lower Mountaineer Creek and Cottonwood Creek, and *estimated widths* for Leviathan Creek above Station 1 and Aspen Creek above Station 22. In Table 5-2, there are *width ranges* for the creeks that had *unknown* listed in Table 4-1 and the same *estimated width* values for Leviathan and Aspen Creeks. Why is there

AMY L. HOHNE, PhD, CHAIR | PATTY Z. KOUYOUMILJIAN, EXECUTIVE OFFICER



3. Page 49, Section 5.1.2.1, bulleted list, first bullet – If the potential reach is very limited in length, the additional reconnaissance mapping should include evaluating additional length upstream for this reach.

determination made?

Cottonwood Creek is selected as a potential reference reach. How was this

4. Page 63, Section 6.0, last paragraph – This section includes additional reconnaissance mapping on Upper Aspen and Leviathan Creeks to determine if stream reaches with similar characteristics are present and to validate findings in Sections 5.1.2.1 and 5.1.2.2. If similar characteristics are determined to be present, what are the next steps for data collection in these stream reaches (e.g. Sediment Quality Triad or floodplain samples)?

If you have any questions regarding these comments, please contact Hannah Schembri, Water Resource Control Engineer at hannah.schembri@waterboards.ca.gov or (530) 542-5423, or me at <a href="https://doi.org/doi.or

for:

Douglas Carey, P.G.

Senior Engineering Geologist, Leviathan Mine